

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FARHAD AZIMA,
ALG TRANSPORTATION INC.,
MAIN 3260 LLC,
FFV W39 LLC, and
FFV DEVELOPMENT LLC,

Plaintiffs,

v.

DECHERT LLP,
DAVID NEIL GERRARD,
DAVID GRAHAM HUGHES,
NICHOLAS DEL ROSSO,
VITAL MANAGEMENT SERVICES, INC.,
AMIT FORLIT,
INSIGHT ANALYSIS AND RESEARCH LLC,
SDC-GADOT LLC,
AMIR HANDJANI,
ANDREW FRANK, and
KARV COMMUNICATIONS,

Defendants.

Civil Action No:
No. 1:22-cv-08728 (S.D.N.Y.)

AFFIDAVIT OF DOMINIC HOLDEN

I, **Dominic Holden** of 5 Stratford Place, London, W1C 1AX STATES ON OATH AS FOLLOWS:-

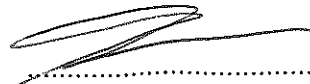
1. I am admitted to practise law as a solicitor of the Supreme Court of England & Wales (Solicitors Regulatory Authority ID: 512267). I am a Partner at Burlingtons Legal LLP ("**Burlingtons**").
2. The facts and matters deposed to in this affidavit are known to me and are true to the best of my knowledge, information and belief. I act as Mr Farhad Azima's solicitor and am authorised to make this statement on his behalf.
3. There is now produced and shown to me a paginated bundle of copy documents, marked "DPH1" ("**Exhibit DPH1**"), to which I refer below. References in square brackets in this affidavit are references to the corresponding page number in Exhibit DPH1.
4. This affidavit is made in respect of a complaint brought on 13 October 2022 by Mr Farhad Azima (the "**Plaintiff**") in the United States District Court for the Southern District of New York under the Racketeer Influenced and Corrupt Organizations Act

(Civil Action No: No. 1:22-cv-08728 (S.D.N.Y.) (the "**RICO Complaint**"), 18 U.S.C. §§ 1961, et seq.

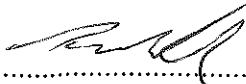
5. In particular, the purpose of this affidavit is to evidence the steps taken on behalf of the Plaintiff to successfully serve Defendant Mr David Hughes, in accordance with Article 10(b) of the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters (the "**Hague Convention**") and Part 6 of the Civil Procedure Rules of England & Wales (the "**CPR**").
6. By way of a Letter of Instruction dated 27 October 2022 [1], I instructed a process serving agency, High Court Enforcement Group Limited, to personally serve the documents listed at paragraph 6.1-6.9 (the "**Documents**") on Defendant Hughes on 31 October 2022 at his residential address, 59 Canons Drive, Edgware, London, HA8 7RG, UK (the "**Address**"), in accordance with Part 6 of the CPR (and therefore in accordance with Article 10(b) of the Hague Convention):
 - 6.1 A cover letter from Burlingtons LLP to Defendant Hughes dated 27 October 2022 [6];
 - 6.2 Summary of the Documents to be Served in Azima, et al. v. Dechert LLP, et al., No. 1:22-cv-08728 (S.D.N.Y.) [8];
 - 6.3 Summons Issued in Azima, et al. v. Dechert LLP, et al., No. 1:22-cv-08728 (S.D.N.Y.) [11];
 - 6.4 Civil Cover Sheet in Azima, et al. v. Dechert LLP, et al., No. 1:22-cv-08728 (S.D.N.Y.) [13];
 - 6.5 Complaint with Exhibits A and B in Azima, et al. v. Dechert LLP, et al., No. 1:22-cv-08728 (S.D.N.Y.) [15];
 - 6.6 Corporate Disclosure for Plaintiff ALG Transportation, Inc. [259];
 - 6.7 Corporate Disclosure for Plaintiff Main 3260 LLC [261];
 - 6.8 Corporate Disclosure for Plaintiff FFV W39 LLC [263]; and
 - 6.9 Corporate Disclosure for Plaintiff FFV Development LLC [265].
7. On 31 October 2022, Mr. Mark Delaney (the "**Process Server**") attended the Address and personally served the Documents in accordance with CPR Part 6.22 by handing

them to Defendant Hughes. This is evidenced by a Certificate of Service dated 21 November 2022, signed by Mr Delaney [4].

SWORN at Hill Dickinson LLP,
105 Jermyn Street, London,
SW1Y 6EE, United Kingdom
This 24th day of November 2022


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Signed

Before me, Timothy Woollard,
Senior Associate, *SENIOR*
Hill Dickinson LLP


.....
Signed

Hill Dickinson LLP
105 Jermyn Street
St James's
London SW1Y 6EE